

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JUSTIN EVERETT.

Plaintiff,

v.

**FIELDWORKS, INC., LAURA
BARKLEY, ZACHARY REIDER, CHRIS
GALLAWAY and LAURA MOORMAN.**

Defendants.

Civil Action No. 2:17-cv-01495-PJP

DECLARATION OF LAURA MOORMAN, née BARKLEY

I, Laura Moorman, hereby declare and state the following:

1. My name is Laura Moorman, née Barkley.

2. I reside in Cincinnati, Ohio, and have
resided here for approximately 6 years, i.e., since June 2013.

3. I served as the Office Director of
FieldWorks in Pittsburgh from August 25, 2016 to October 10, 2016.

4. Upon commencement of my duties in the
Pittsburgh office, I learned that FieldWorks decided to terminate Plaintiff for registering
numerous individuals to vote who he had already registered.

5. I was instructed to terminate Plaintiff
accordingly from the data entry team in Philadelphia.

6. FieldWorks did not replace Plaintiff with a
Caucasian employee nor did FieldWorks replace him with a female employee.

7. I had no other interaction with Plaintiff and
had no oversight over Plaintiff's employment.

any contacts, in Pennsylvania.

I conduct no regular business, nor do I have

9. Following the voter registration deadline for the 2016 election, the FieldWorks Pittsburgh office was closed as it had fulfilled its sole purpose – to collect complete voter registration cards from citizens in the Pittsburgh area who need to register or update their registration.

10.

I am currently unemployed.

I, Laura Moorman, declare under penalty of perjury that the foregoing is true and correct.


Laura Moorman

Dated: 2-15-2018, 2018